

Fudim, Elissa P. (CIV)

From: Ward, Brian C. (CIV)
Sent: Thursday, March 30, 2023 2:16 PM
To: St. John, Joseph; Ryan, Erin T. (CIV); Darrow, Joseph A. (CIV)
Cc: Redmon, Jordan; james.percival@myfloridalegal.com; 'Anita Patel'
Subject: RE: Arizona v. Garland - No. 6:22-cv-1130 (W.D. La.) - Summary of Meet and Confer

Hey Scott,

This is not an accurate summary of our call. This misstates things that were said on the call and includes things that were not discussed. Ultimately though, as I said on the call, I think all of this is premature while we're still searching for documents. As we previously discussed, agreed, and told the Court, we need approximately another 30 days to search for responsive documents, and we plan to serve updated responses and objections once we have completed that search and production. I don't know that any of this is ripe for discussion until we determine what we're producing and whether we ultimately withhold documents based on our objections or revise those objections.

Thanks for forwarding the stipulation. We will review and discuss on our end, though on an initial skim it does not appear that this contemplates turning over information on whether individuals have applied for asylum or says anything about asylum at all. Can you provide an explanation for why identifying information about asylum seekers is necessary in your view? If the rule at issue in this case has not meaningfully affected the number of asylum seekers in Louisiana then the identity of the asylum seekers seems irrelevant even under Plaintiffs' theory of standing.

Thanks,
Brian